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*Attorneys for Defendant,
Latonia Smith*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LATONIA SMITH,

Defendant.

Case No.: 2:19-cr-00304-RFB-VCF-1

**DEFENDANT'S SUPPLEMENTAL
PROPOSED JURY INSTRUCTIONS**

Certification: These supplemental jury instructions are timely filed.

Latonia Smith, by way of her counsel, Telia Mary U. Williams, Esq., and
Gwynne R. Dumbrigue Esq., respectfully propose the following supplemental jury
instructions, in addition to the ones heretofore proposed:

Supplemental Jury Instruction 1:

Threatening to do something that a person has a legal right to do is not a
threat to commit an unlawful injury.

1 *See generally, United States v. Bagdasarian*, 652 F.3d 1113, 1122-23 (9th Cir.
2 2011); cf., California Penal Code §523 (Cal. Crim No. 1831, Threatening
3 Letters).
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5 **Supplemental Jury Instruction 2:**

6 Statements that are merely predictive are not unlawful.

7 *See ids.*

8 Dated this 28th day of April, 2021.

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10 Respectfully submitted,

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12 LAW OFFICE OF TELIA U. WILLIAMS
13 /s/ Telia Mary U. Williams, Esq.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the following date the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which sent notification of such filing to all counsel of record. At the same time, a copy of the document was sent to Government counsel by email, and a hard copy of this motion was also mailed to the defendant in custody.

Dated: April 28, 2021

/s/ David DaSilva

For the Law Office of Telia U. Williams